

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRIDGESTONE SPORTS CO., LTD., and
BRIDGESTONE GOLF, INC.,

Plaintiffs,

v.

ACUSHNET COMPANY,

Defendant.

C.A. No. 05-132 (JJF)

**REDACTED –
PUBLIC VERSION**

DECLARATION OF BRANDON M. WHITE

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Original Filing Date: April 9, 2007

Redacted Filing Date: April 10, 2007

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DECLARATION OF BRANDON M. WHITE

I, Brandon M. White, hereby declare:

1. I am an associate at the law firm of Paul, Hastings, Janofsky & Walker LLP ("Paul Hastings").

2. Pursuant to paragraph 4 of the Court's Order of August 3, 2006 (D.I. 154), I was one of the two lawyers at Paul Hastings designated as responsible to the Court for discovery matters and for compliance with the Court's discovery Orders (D.I. 156).

3. Paul Hastings represents the plaintiffs Bridgestone Sports Co., Ltd. and Bridgestone Golf, Inc. ("Bridgestone") in this case. I make this declaration in support of Bridgestone's Reply Brief In Support Of Its Motion For Sanctions.


4. Acushnet states that Bridgestone produced "more than 39,000 pages of documents" after September 1, 2006 (D.I. 323 at 3, 4). I have reviewed the documents that Bridgestone produced after September 1, 2006.

5. Most of those documents – [REDACTED]
[REDACTED] – appear to be Bridgestone's experts' test data, which Bridgestone disclosed during expert discovery pursuant to the scheduling order.

6. With the exception of those expert test results, additional financial documents (which both parties agreed to update through the end of the third quarter of 2006 in November 2006), certified English translations of the Japanese priority documents for the Bridgestone patents-in-suit, and two other documents, the rest of the documents referenced by Acushnet were produced by October 2006 in response to specific written requests from Acushnet.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: April 9, 2007



Brandon M. White

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CERTIFICATE OF SERVICE

I certify that on April 10, 2007, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to Richard L. Horwitz.

I further certify that I caused copies to be served upon the following on April 10, 2007 in the manner indicated:

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